EDWARDS ANGELL PALMER & DODGE LLP David R. Marshall Rachel B. Jacobson Attorneys for Defendants 750 Lexington Avenue New York, New York 10022 212.308.4411 dmarshall@eapdlaw.com

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	Х	
KEITH TURNER,	:	
Plaintiff,	;	
-against-	:	06 Civ. 1910 (GBD)
NYU HOSPITALS CENTER, NYU MEDICAL CENTER, NYU SCHOOL OF MEDICINE, and	:	NOTICE OF MOTION
NYU HEALTH SYSTEM,	;	
Defendants.	:	
	X	

PLEASE TAKE NOTICE that upon the annexed Declarations of David R. Marshall, Esq., sworn to on August 12, 2010; Hilda Pineda, sworn to on August 11, 2010; Reginald D. Odom, Esq., sworn to on August 10, 2010; Udel DeGazon, sworn to on August 9, 2010; and the exhibits thereto; the annexed Rule 56.1 Statement; the accompanying memorandum of law; and all prior proceedings had herein, Defendants will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be determined by the Court, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment to Defendants, dismissing Plaintiff Keith Turner's complaint with prejudice,

and granting such other and further relief, including costs and attorneys' fees, as this Court deems just and proper.

Dated: August 12, 2010

New York, New York

EDWARDS, ANGELL, PALMER & DODGE LLP

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